Requirements, Recom	Evaluation Report mendations, Recognitions AC 15-13
MS4 Name: CITY OF COLUMBUS	Date of Evaluation: 09/08/2011
Permit Number: INR040098	Completed By: Reggie Korthals, MPA MS4 Program Coordinator 317-234-1601 rkorthal@idem.IN.gov
MS4 Operator: David L Hayward, P.E. 123 Washington Street Columbus IN 47201 812-376-2540 dhayward@columbus.in.gov	MS4 Coordinator: Becky Douglas 123 Washington Street Columbus IN 47201 812-376-2540 bdouglas@columbus.in.gov
Participants Representing the MS4  • Becky Douglas  • David Hayward	<ul><li>Jason Perry</li><li>Aimee Morris</li></ul>

	1					PROGRAM AREA 327 IAC 15-13 PROGRAM MANAGEMENT ASSESSMENT
S	M	U	Y/N	NA/NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable  NE = Not Evaluated Y = Yes N = No
S			Υ		1.	Did the MS4 submit a renewal NOI and SWQMP Part A?
S			Υ		2.	Did the MS4 submit a Part B Baseline Characterization 2010 update if necessary?
S			Υ		3.	Did the MS4 submit a SWQMP Part C 2010 update?
S			Υ		4.	Did the MS4 submit 2010 annual report by the required date?
S			Υ		5.	Did the MS4 regularly measure progress against the goals stated in the SWQMP?
S			Υ		6.	Did the MS4 implement the BMPs identified in the original SWQMP?
S			Υ		7.	Did the MS4 supply a summary of the current storm water budget, expected or actual funding source, and a projection of the budget for the next permit cycle?
				NA	8.	If Co-permitted, is there an MOU or Inter-local agreement?
				NA	9.	If Co-Permitted, does each party have a copy of the signed agreement?
				NA	10.	If Co-permitted, has the agreement been reviewed for the second permit term?
S			Υ		11.	Does the MS4 document all program management activities and maintain appropriate records?
S			Υ		12.	Is the MS4 a CSO community and has the LTCP been updated to include storm water practices?
S			Υ		13.	Is the MS4 in a Wellhead Protection area and has the Protection Plan been updated to include storm water practices?
S			Υ		14.	Was the MS4 prepared for the permit evaluation and inspection and did they provide materials requested by IDEM?

- The City of Columbus MS4 has increased its program implementation in the second permit cycle.
- The City of Columbus is submitting all required permit documentation on time.
- The MS4 completed a review of the SWQMP Part B and Part C and submitted the updates to IDEM in January 2011.

- The MS4 demonstrated that it has developed and implemented the required ordinances.
- The City of Columbus has taken the lead in working with Bartholomew County on the development of a memorandum of understanding (MOU) for storm water program implementation in the area.

### **Requirements:**

• The City of Columbus should continue to implement their SWQMP at or above the current level.

#### **Further Action by IDEM:**

• IDEM will continue to monitor program management through assessment of the SWQMP, review of annual reports and periodic inspections.

					PUBI	PROGRAM AREA 327 IAC 15-13-12 LIC EDUCATION AND OUTREACH ASSESSMENT
s	М	U	Y/N	NA/NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable  NE = Not Evaluated Y = Yes N = No
S			Υ		1.	Did the MS4 provide reasonable documentation to show an attempt was made to reach all constituents within the MS4 area?
	М		Υ		2.	Did the MS4 implement the best management practices (BMP) identified in their SWQMP for this MCM?
S			Υ		3.	Did the MS4 utilize existing programs and outreach materials?
S			Υ		4.	Did the MS4 collaborate and/or coordinate with other MS4s or organizations in the MS4 area to implement an educational program?
	М		Υ		5.	Did the MS4 do an initial storm water quality assessment of constituent knowledge?
			Ν		6.	Did the MS4 do a follow-up assessment of constituent knowledge ?
	М		Υ		7.	Were specific target outreach or goal percentages and timetables identified?
S			Υ		8.	Did the MS4 target improvements in disposal practices (Recycling)?
S			Υ		9.	Did the MS4 target schools and school curriculum for storm water education?
S			Υ		10.	Did the MS4 provide copies of all materials produced and used in educational program for the permit evaluation?

#### **Observations & Recommendations:**

- The City of Columbus MS4 did not implement all of the best management practices that were identified in the original SWQMP. The MS4 reviewed the Pact C in January 2011 and have adjusted their goals to reflect what they can accomplish. The MS4 demonstrated a plan to achieve their new goals.
- The MS4 works cooperatively with the Bartholomew County Solid Waste Management District, the Soil and Water Conservation District, and the Purdue Cooperative Extension Service on program implementation.
- The MS4 has begun to develop a storm water web page on the city's web site.
- The initial constituent storm water knowledge assessment was not completed until 2011 during the second permit term. The response was minimal with no significant response. The MS4 needs to implement it's the revised goals and complete a second survey at the end of 2013.

### **Requirements:**

• The City of Columbus MS4 shall review and track new goals and timetables identified in the revised SWQMP Part C for public education and outreach and report progress in the 2012 annual report.

### **Further Action by IDEM:**

 IDEM will continue to monitor the public education and outreach program through assessment of the SWQMP, review of annual reports and periodic inspections.

					PU	PROGRAM AREA 327 IAC 15-13-13 BLIC PARTICIPATION AND INVOLVEMENT ASSESSMENT
s	М	U	Y/N	NA/NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable  NE = Not Evaluated Y = Yes N = No
S			Υ		1.	Did the MS4 develop provisions to allow opportunities for citizens to participate in the storm water management program development, implementation, and review?
S			Υ		2.	Does the MS4 have a plan to provide for on-going public participation?
S			Υ		3.	Did the MS4 comply with applicable public notice requirements?
S			Υ		4.	Did the MS4 supply documentation of public events?
	М		Υ		5.	Did the MS4 provide program updates and storm water information to elected officials?
	М		Υ		6.	Did the MS4 identify specific outreach and reduction goal percentages and identify a timetable and was the timetable met?
S			Υ		7.	Did the SWQMP goals for this MCM address participation in citizen panels, community clean-ups, citizen watch groups, drain marking projects and public meeting notification?

- The City of Columbus MS4 demonstrated that it recognized that more needs to be done in providing information to elected officials and in identifying goal percentages and timetables.
- The MS4 has a storm drain volunteer marking program in place.
- The MS4 is working with the high school on integrating the senior project program to help with storm water education and public participation.

### Requirements:

• The City of Columbus MS4 shall review and track new goals and timetables identified in the revised SWQMP Part C for public participation and involvement and report progress in the 2012 annual report.

# **Further Action by IDEM:**

• IDEM will continue to monitor the public involvement and participation program through assessment of the SWQMP, review of annual reports and periodic inspections.

	PROGRAM AREA 327 IAC 15-13-14 ILLICIT DISCHARGE DETECTION AND ELIMINATION ASSESSMENT									
s	M	U	Y/N	NE		S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable  NE = Not Evaluated Y = Yes N = No				
s			Υ		1.	Did the MS4 complete a storm sewer map showing the location of all outfalls and MS4 conveyances in the MS4 area under the MS4s control?				
S			Υ		2.	Did the MS4 develop and implement an ordinance or other regulatory mechanism that prohibits illicit discharges into MS4 conveyances and establishes appropriate enforcement procedures and actions? <b>DATE IMPLEMENTED: JUNE 17, 2008</b>				
		U	N		3.	Did the MS4 develop a plan to detect, address, and eliminate illicit discharge, including illegal dumping into the MS4 conveyances?				
		U	N		4.	At a minimum, did the MS4 develop a dry weather-screening program with documentation?				
		U	Ν		5.	Did the MS4 develop a list of all active industrial facilities within the MS4 area that discharge into the MS4 conveyance?				
S			Υ		6.	Did the MS4 develop and implement an educational program for employees, businesses, and the public about proper disposal of waste and hazards of illicit discharge?				

S		Υ	7.	Did the MS4 initiate or coordinate existing, recycling program?
S		Υ	8.	Did the MS4 develop measureable goals for this MCM?

- The City of Columbus MS4 has completed the mapping of all outfalls and has provided the names and locations of receiving waters.
- The MS4 has developed and implemented an ordinance that addresses illicit discharge.
- The MS4 has a report a polluter phone number on their storm water web page.
- The MS4 has not completed the comprehensive IDDE plan that would include outfall dry weather screening, a list of active industrial sites that discharge into their receiving waters and an employee-training program.
- The business, school and public education is done by the Bartholomew County Solid Waste Management District.

#### Requirements:

- The City of Columbus MS4 shall complete an IDDE plan that includes a time table for implementation and submit the plan to IDEM on or before December 15, 2011.
- The MS4 plan shall identify a process to detect, address, and eliminate illicit discharge, including illegal dumping into the MS4 conveyances.
- The MS4 plan shall include a dry weather-screening program with documentation.
- The MS4 shall develop a list of all active industrial facilities within the MS4 area that discharge into the MS4 conveyance.

# **Further Actions by IDEM:**

- IDEM will continue to monitor the illicit discharge and detection program through assessment of the SWQMP, review of annual reports and periodic inspections.
- The field audit for IDDE will be conducted at a future date.

S M U Y/N NE S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No  Did the MS4 complete and implement an ordinance or other regulatory mechanism that prohibits illicit discharges into MS4 conveyances and establishes appropriate enforcem	PROGRAM AREA 327 IAC 15-13-15 CONSTRUCTION SITE STORM WATER RUN-OFF CONTROL ASSESSMENT							
	s M	/ I	U	Y/N	NE			
procedures and actions? DATE IMPLEMENTED: 6/17/2008	s			Υ		1. prohibits illicit discharges into MS4 conveyances and establishes appropriate enforcement		

• The IDEM storm water specialist completed the audit and submitted the report on 12-2-2010

	PROGRAM AREA 327 IAC 15-13-16 POST-CONSTRUCTION STORM WATER RUN-OFF CONTROL ASSESSMENT								
s	S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable NE = Not Evaluated Y = Yes N = No								
S	S Y Did the MS4 complete and implement an ordinance or other regulatory mechanism to control post construction storm water run-off? DATE IMPLEMENTED: 6/24/2008								
	The IDEM storm water specialist completed the audit and submitted the report on 12-2-2010								

	PROGRAM AREA 327 IAC 15-13-17 MUNICIPAL OPERATIONS POLLUTION PREVENTION AND GOOD HOUSEKEEPING ASSESSMENT									
						S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable				
S	M	U	Y/N	NE		NE = Not Evaluated Y = Yes N = No				
S			Υ		1.	Did the MS4 develop and implement a program to prevent or reduce storm water pollutant run-off from municipal operations? (Facility SWPPP)				
S			Υ		2.	Did the MS4 keep documentation of maintenance activities, schedules, and long-term inspection procedures for BMPs?				
S			Υ		3.	Did maintenance activities include, as appropriate: litter pick-up, BMP structure cleaning, pavement sweeping, roadside shoulder/ditch stabilization, care of roadside vegetation, remediation of outfall scouring?				
S			Υ		4.	Did the MS4 provide documentation of procedures for the proper disposal of waste or materials removed from separate storm sewer systems and operational areas?				
s			Υ		5.	Did the MS4 implement standard operating procedures for spill prevention and clean up during fueling operations?				
s			Υ		6.	Did the MS4 provide documentation that MS4 entity employees received storm water pollution prevention training?				
S			Υ		7.	Did the MS4 provide a facility maps?				
S			Υ		8.	Did the MS4 complete a municipal operations analysis or self-inspection?				

- The City of Columbus MS4 has developed and implemented a storm water pollution prevention program (SWPPP) at its municipal facilities.
- Employees have received the initial SWPPP training at the facilities.
- The municipal facilities were well managed with appropriated BMPs in place

#### Requirements:

• The MS4 shall continue to implement, track, document and train employees on SWPPP procedures.

### **Further Actions:**

• IDEM will continue to monitor the municipal good housekeeping program through assessment of the SWQMP, review of annual reports and periodic inspections.

# **Municipal Facilities Inspected:**

- City Garage and Transit Facility 2250 Kreutzer Drive
- Park Operations and Maintenance 330 11th Street